

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE**

JOHN JONES,)
)
Plaintiff,)
)
v.) NO. 1:14-CV-00114
)
CITY OF FRANKLIN, TENNESSEE,) JUDGE HAYNES
MARC SWAIN, CARLOS CORDERO,)
JEFF CARSON, RYAN FRAZIER,)
NICK GRANDY, CORY KROEGER,)
DAVID JENKINS, WILLIAMSON)
MEDICAL CENTER, SHAWNA M.)
DANIEL, R.N., JON ANDREW)
RUSSELL, M.D.,)
)
Defendants.)

**DEFENDANTS' MOTION TO FILE DOCUMENTS SUPPORTING
THEIR MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

Come now, Williamson Medical Center and Shawna M. Daniel, RN ("the Defendants"), and move to file documents under seal. The Defendants intend to file a Motion for Summary Judgment on or before June 15, 2015. In support of this Motion, the Defendants will submit (1) a Memorandum of Law, (2) a Statement of Undisputed Material Facts, and (3) a Notice of Filing, which will include (a) Mr. Jones' Bates-stamped medical records from Williamson Medical Center, (b) deposition testimony from Dr. Jon Andrew Russell, (c) deposition testimony from Jennifer Brothers, RN, and (d) the expert affidavit of Donna Seger, M.D. These documents contain some references to Plaintiff's protected health information. At the initial case management conference, Plaintiff's counsel expressed concern about this information being publicly-filed. Therefore, in support of their Motion for Summary Judgment, to be filed on or

before June 15, 2015, these Defendants request permission to file Documents (1), (2), and (3) under seal.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

s/ J. Blake Carter

Bryan Essary, #

J. Blake Carter, #30098

315 Deaderick Street, Suite 1100

Nashville, TN 37238

(615) 254-0400

bryan@gideoncooper.com

blake@gideoncooper.com

*Attorneys for Williamson County Hospital
District, d/b/a Williamson Medical Center,
and Shawna M. Daniel, R.N.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished, by electronic means via the Court's electronic filing system, this 11th day of June, 2015, to the following:

Jerry Gonzalez
Jerry Gonzalez, PLC
2441-Q Old Fort Parkway, No. 381
Murfreesboro, TN 37128

Counsel for Plaintiff

Robert Burns
Howell & Fisher, PLLC
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201

*Counsel for City of Franklin, Marc Swain,
Carlos Cordero, Jeff Carson, Nick Grandy,
Cory Kroeger and David Jenkins*

Edward Hadley
North, Pursell & Ramos, PLC
Bank of America Plaza
414 Union Street, Suite 1850
Nashville, TN 37219

Counsel for Jon Andrew Russell, M.D.

s/ J. Blake Carter